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CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

np DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

June 2014 Grand Jury

15 CR 0903 CAB

UNITED STATES OF AMERICA,

Case No. _____

Plaintiff,

I N D I C T M E N T

v.

Title 18, U.S.C., Sec. 371 -
Conspiracy; Title 18, U.S.C.,
Sec. 2113(a) - Bank Robbery;
Title 18, U.S.C., Sec. 2 - Aiding
and Abetting

HECTOR RAMOS (1),
SAMMY GARCIA (2),

Defendants.

The grand jury charges:

Count 1

Beginning at a date unknown to the grand jury and continuing up to and including March 9, 2012, within the Southern District of California, and elsewhere, defendants HECTOR RAMOS and SAMMY GARCIA, with the intent to violate the laws of the United States, did knowingly and intentionally conspire together and with each other and with other persons known and unknown to the grand jury, to, by force, violence and by intimidation, unlawfully take from the person and presence of an employee of a financial institution a sum of money, belonging to and in the care, custody, control, management, and possession of the financial institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation (FDIC); in violation of Title 18, United States Code, Section 2113(a).

OVERT ACTS

In furtherance of said conspiracy and to accomplish the objects thereof, the following overt acts, among others, were committed by the conspirators within the Southern District of California and elsewhere:

1. On or about March 9, 2012, defendant HECTOR RAMOS entered the Wells Fargo bank at 4960 63rd Street, San Diego, California, and approached a teller. He then handed her a note in which he demanded money and claimed to have a gun.
2. On or about March 9, 2012, after robbing the Wells Fargo bank, defendant HECTOR RAMOS fled the bank's parking lot in a Honda Civic, California license number 4CLR390.
3. On or about March 9, 2012, approximately 5 minutes after robbing the Wells Fargo bank, defendant HECTOR RAMOS abandoned the Honda Civic in a nearby alley and got into a Toyota Camry, CA license number 3PBV529, owned and driven by defendant SAMMY GARCIA, who proceeded to drive out of the area.

All in violation of Title 18, United States Code, Section 371.

Count 2

On or about March 9, 2012, within the Southern District of California, defendant HECTOR RAMOS and SAMMY GARCIA, by force, violence and by intimidation, did unlawfully take from the person and presence of an employee of Wells Fargo Bank, 4690 63rd Street, San Diego, California, the sum of approximately \$636.00, belonging to and in the care, custody, control, management, and possession of Wells Fargo Bank, a bank, the deposits of which were then insured by the

1 Federal Deposit Insurance Corporation (FDIC); in violation of
2 Title 18, United States Code, Section 2113(a) and Section 2.


3 DATED: April 8, 2015.

4
5 A TRUE BILL:

6 
7 Foreperson

8 LAURA E. DUFFY
9 United States Attorney

10
11 By:

12 
MICHAEL E. LASATER
Assistant U.S. Attorney